

Affidavit of Matthew J. Hoffman

1. I am a Postal Inspector with the United States Postal Inspection Service stationed in St. Paul, Minnesota.
2. I am the lead case agent investigating the Defendant's use of the U.S. mails to carry out an extensive mail and credit card fraud scheme.
3. This affidavit will supplement my testimony from the November 22, November 23, and December 1, 2011, evidentiary hearing.
4. During cross-examination, I testified that the Toronto Police Service's (TPS) investigation of Joseph Ajibaye was not related to my investigation into Syspac Financial Services. I correctly testified at the hearing that TD Bank investigator Murray Walker told me that Ajibaye had been arrested, and that I believed I contacted the arresting precinct and obtained the report, and after reviewing the report I determined that the Ajibaye case was not related to my investigation. At the time of my testimony, I did not recall the specific reasons why the Ajibaye investigation was unrelated. Since my testimony, I have reviewed the TPS report concerning Ajibaye, and now recall the Ajibaye case involved the ordering of Dell computers and having them shipped to apartments, rather than CMRAs in Canada. These apartments were not located on Danforth or Weston Roads in Toronto, Ontario. This fraud scheme was distinct from scheme involving the Defendant.
5. There were five cell phones and 11 SIM cards seized from Mr. Akande's residence in London, United Kingdom. Forensic examination of these devices revealed no recent calls to financial institutions in the United States.

Dated this 18th day of January, 2012.

Matthew Hoffman
Matthew J. Hoffman
U.S. Postal Inspector